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7 UNITED STATES DISTRICT COURT  
8 CENTRAL DISTRICT OF CALIFORNIA  
9

10 CHARLES OWENS and FELICIA  
11 LIVINGSTON, individually and on  
12 behalf of all others similarly situated,

13 Plaintiffs,

14 v.

15 SMITH, GAMBRELL & RUSSELL  
16 INTERNATIONAL, LLP; and DOES  
1-100,

17 Defendants.  
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**CASE NO. 2:23-cv-01789-JAK-JDE**  
**STIPULATION RE VOLUNTARY**  
**DISMISSAL PER FRCP 41a (1)**

**Judge: Hon. John A. Kronstadt**  
**Courtroom: 10C**

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Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiffs Charles Owens and Felicia Livingston and Defendant Smith, Gambrell & Russell International, LLP, hereby stipulate and agree to Plaintiffs' voluntary dismissal of this action in its entirety, without prejudice, and that each party shall bear its own fees and costs except as may otherwise be provided by any agreement between the parties.

IT IS SO STIPULATED.

Dated: December 4, 2024

**COLE & VAN NOTE**

By: /s/ Laura Grace Van Note  
Laura Grace Van Note, Esq.

*Attorneys for Representative Plaintiffs*

Dated: December 4, 2024

**CLARK HILL LLP**

By: /s/ Mason N. Floyd  
Mason N. Floyd, Esq.

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that, on December 04, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served today on all counsel of record in this case via transmission of Notice of Electronic Filing generated by CM/ECF and on counsel in the related cases to their respective emails per the below service list.

/s/Laura Grace Van Note  
Laura Grace Van Note, Esq.